

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NIRVETA KUSURAN,

Plaintiff,

v.

SIX CONTINENTS HOTELS, INC., d/b/a
INTERCONTINENTAL HOTELS GROUP,

Defendant.

Case No.: 1:08-cv-00794

Honorable James B. Moran
Magistrate Judge Nan R. Nolan

JOINT MOTION TO ENLARGE BRIEFING SCHEDULE

Plaintiff Nirveta Kusuran (“Plaintiff”) and Defendant Six Continents Hotels, Inc. (“Six Continents”), by their respective counsel, move this Honorable Court for an order enlarging and resetting the previously set briefing schedule for the parties’ dispositive motions, and in support thereof, state as follows:

1. On May 4, 2008, the Court entered a briefing schedule for the parties’ dispositive motions. The parties’ opening briefs are currently due on August 18, 2008, their responses are due on September 9, 2008 and their replies on September 19, 2008.

2. Counsel for Defendant substituted in on July 28, 2008 and on August 7, 2008, she received a telephone call from counsel for Plaintiff, Stephen B. Horwitz, requesting an extension of the briefing schedule. The parties agreed that it would be beneficial to both of them to enlarge the briefing schedule and, as such, request an enlargement of thirty (30) 30 days of the previously entered briefing schedule.

3. This motion is brought in good faith and not to delay or otherwise prejudice the proceedings in this matter.

WHEREFORE, the parties respectfully request that this Honorable Court enlarge the previously entered briefing schedule by thirty (30) days, with the parties' dispositive motions now due on September 18, 2008, their cross-responses on October 10, 2008 and their replies on October 20, 2008.

Respectfully Submitted,

SIX CONTINENTS HOTELS, INC.,
Defendant

NIRVETA KUSURAN,
Plaintiff

By: /s/ Edna S. Bailey
One of Its Attorneys

By: /s/ Stephen B. Horwitz
One of Her Attorneys

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CERTIFICATE OF SERVICE

The undersigned, an attorney, hereby certifies that on August 18, 2008, a copy of the foregoing was served by operation of the Court's electronic filing systems upon all counsel of record.

Parties may access this filing through the Court's system.

/s/ Edna S. Bailey

Edna S. Bailey